

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

v.

JOHN ADAMS

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CRIMINAL NO. 21-144-1

ORDER

AND NOW, this _____ day of September, 2023, it is hereby ORDERED and DECREED that the Federal Defender is hereby withdrawn from counsel for the Defendant, John Adams, and new counsel shall be appointed.

BY THE COURT:

HONORABLE GERALD A. McHUGH
United States District Court Judge

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

v.

JOHN ADAMS

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CRIMINAL NO. 21-144-1

MOTION TO WITHDRAW AS COUNSEL

Jonathan McDonald, counsel for defendant, respectfully requests that this Court permit him to withdraw as counsel in the above referenced case, and in support thereof, states as follows:

1. On April 8, 2021, Mr. Adams was charged by Indictment with two counts of sex trafficking of a minor, tampering with evidence and aiding and abetting and the Federal Defender was subsequently appointed as counsel.

2. On September 15, 2022, Mr. Adams was charged in a Superseding Indictment with two counts of sex trafficking of a minor, tampering with evidence, tampering with a witness, false statements and aiding and abetting.

3. On November 22, 2022, Mr. Adams entered a plea of guilty pursuant a guilty plea agreement to all the charges where the government is limited is limited by paragraph 2(a) as follows: “At the time of sentencing, the government will ... [m]ake whatever sentencing recommendation the government deems appropriate provided its recommendation is within the applicable Sentencing Guideline range.” The guilty plea also includes notice to the Defendant that the charges include a mandatory minimum of 10 years of imprisonment.

4. On March 3, 2023, undersigned counsel entered his appearance as counsel of record for the Federal Defender representing Mr. Adams.

5. On May 10, 2023, a presentence report was authored with a recommended guideline imprisonment range of 360 months to life.

6. Counsel is currently unable to effectively represent Mr. Adams at a sentencing and it appears that a conflict has arisen in regard to further representation. Counsel can expound upon the details of the conflict at a status conference if necessary.

7. At this juncture, counsel believes that there is good cause to grant a withdrawal as the relationship between counsel and the defendant seems to be at a place where it would not be productive of prudent to continue the attorney-client relationship.

8. Permitting counsel to withdraw at the time would not materially adversely affect Mr. Adams interests. In light of the mandatory minimum sentence of 10 years and the guideline imprisonment range of 360 months to life proposed by the presentence report, there is more than sufficient time for new counsel to review the matter, discuss all potential pre-sentencing litigation with Mr. Adams, and to move forward with representation.

WHEREFORE, undersigned counsel respectfully requests this Honorable Court enter an order withdrawing his appearance as counsel on behalf of Defendant, Mr. Adams.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Jonathan McDonald', with a stylized flourish at the end.

JONATHAN McDONALD
Assistant Federal Defender

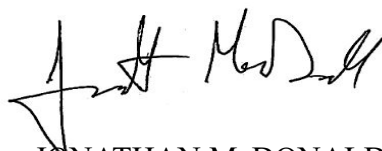
Date: September 15, 2023

CERTIFICATE OF SERVICE

I, Jonathan McDonald, counsel for the Defendant, John Adams, hereby certify that on this fifteenth day of September, 2023, I caused a true and correct copy of the foregoing Motion to Withdraw as Counsel to be served by ECF upon all counsel of record, including:

Erica Kivitz
615 Chestnut Street, Suite 150
Philadelphia, PA 19106
Erica.kivitz@usdoj.gov

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Jonathan McDonald", with a stylized flourish at the end.

JONATHAN McDONALD
Assistant Federal Defender